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Attorneys for Defendants BRIUS
MANAGEMENT CO., BRIUS, LLC and
SHLOMO RECHNITZ

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

NANCY HEARDEN; individually and as
successor in interest to ARTHUR
TRENERRY (Decedent); et al.,

Plaintiffs,

vs.

WINDSOR REDDING CARE CENTER,
LLC; SHLOMO RECHNITZ, BRIUS
MANAGEMENT CO.; BRIUS, LLC; LEE
SAMSON, an individual; S&F
MANAGEMENT COMPANY; and DOES 1
through 50, inclusive,

Defendants.

No. 2:22-CV-00994-MCE-DMC

**STIPULATION AND ORDER
REGARDING MOTION TO REMAND
BRIEFING SCHEDULE**

The Plaintiffs, Brius Management Co., Brius, LLC (together with Brius Management Co., the “Brius Defendants”), Shlomo Rechnitz, Windsor Redding Care Center, LLC, Lee Samson, and S&F Management Company (all of the foregoing, the “Parties”), by and through their undersigned counsel, hereby submit the following stipulation.

1 WHEREAS, Plaintiffs filed a complaint in the Superior Court of the State of California for
2 Shasta County on August 26, 2021, and filed a First Amended Complaint in that court on April 27,
3 2022;

4 WHEREAS, the Brius Defendants removed the action to this Court on June 6, 2022;

5 WHEREAS, Plaintiffs filed a motion to remand this case to state court on June 30, 2022,
6 setting such matter for hearing on August 4, 2022;

7 WHEREAS, on July 1, 2022, the Court entered a Minute Order vacating the August 4,
8 2022 hearing and ordering that opposition and reply dates on the motion to remand “shall be filed
9 in accordance with the original motion hearing date,” as a result of which opposition is due by
10 July 14 and reply on July 25;

11 WHEREAS, defense counsel have requested (due to an unexpected health issue), and
12 plaintiffs’ counsel have agreed, to a one-week extension of the foregoing dates for opposition and
13 reply;

14 NOW, THEREFORE, the Parties, by and through their undersigned counsel, hereby
15 stipulate to the following.

16 1. The deadlines for opposition and reply papers on the Plaintiffs’ pending motion to
17 remand are hereby each extended one week to July 21, 2022 (opposition) and August 1, 2022
18 (reply), respectively.

19 2. The hearing date on the motion to remand remains vacated.

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21 [Signatures and Order on next page]
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1 DATED: July 14, 2022

REINER, SLAUGHTER, MAINZER
& FRANKEL, LLP
KERSHAW, COOK & TALLEY PC
YORK LAW CORPORATION

5 By: /s/ Stuart Talley (as authorized on July 12, 2022)
6 STUART C. TALLEY
Attorneys for Plaintiffs

7 DATED: July 14, 2022

MUNGER, TOLLES & OLSON LLP

10 By: /s/ Joseph D. Lee
11 JOSEPH D. LEE
Attorneys for Defendants BRIUS MANAGEMENT
12 CO., BRIUS, LLC and SHLOMO RECHNITZ


13 DATED: July 14, 2022

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17 By: /s/ Josua Sable (as authorized on July 11, 2022)
18 JOSHUA SABLE
Attorneys for Defendants WINDSOR REDDING
19 CARE CENTER, LLC, LEE SAMSON, and S&F
20 MANAGEMENT COMPANY

22 **IT IS SO ORDERED.**

23 Dated: July 14, 2022

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25 MORRISON C. ENGLAND, JR.
26 SENIOR UNITED STATES DISTRICT JUDGE